

10/13

1 VICKI J. AZNARAN  
2 RICHARD N. AZNARAN  
3 IN PRO PER  
4 5521 Greenville Avenue  
5 Dallas, Texas 75206  
6 (214) 823-4037

FILED

7 By BARRY VAN SICKLE  
8 Attorney of Record and Specially Appearing  
9 for the Purpose of Answering the Counterclaim  
10 1600 Wilshire Boulevard, Suite 300  
11 Los Angeles, California 90017  
12 (213) 413-3600

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

12	VICKI J. AZNARAN and RICHARD N.	)	Case No. CV-88-1786-JMI(Ex)
13	AZNARAN,	)	
14	Plaintiffs,	)	ANSWER TO COUNTERCLAIM
15	vs.	)	OF CHURCH OF SPIRITUAL
16	CHURCH OF SCIENTOLOGY OF	)	TECHNOLOGY
17	CALIFORNIA, INC., et. al.,	)	
18	Defendants.	)	
19	RELIGIOUS TECHNOLOGY CENTER,	)	
20	Counterclaimants,	)	
21	vs.	)	
22	VICKI J. AZNARAN and	)	
23	RICHARD N. AZNARAN,	)	
24	Counterdefendants	)	

25 Plaintiffs and Counterdefendants RICHARD N. AZNARAN and  
26 VICKI J. AZNARAN (hereinafter "The AZNARANS"), answer Church of  
27 Spiritual Technology's Counterclaim in this action as follows:  
28

1           1.    The AZNARANS are informed and believe and on that  
2 basis admit that Counterclaimant Church of Spiritual Technology  
3 ("CST") is a corporation organized under the laws of the State of  
4 California with its principal office in the County of Los Angeles.  
5 The AZNARANS deny the remainder of the averments in paragraph 1.

6           2.    The AZNARANS admit the truth of the averments in  
7 paragraph 2.

8           3.    The AZNARANS deny that the amount in controversy  
9 with respect to the purported counterclaim exceeds \$10,000.00.

10          4.    The AZNARANS deny each and every averment of  
11 paragraph 4..

12          5.    The AZNARANS admit the averments of paragraph 5  
13 insofar as Vicki Aznaran served as President of RTC during the  
14 period between in or about 1983 until in or about April, 1987.  
15 The AZNARANS admit that, as President of RTC, Vicki Aznaran  
16 participated in the management of RTC's corporate and legal  
17 affairs. The AZNARANS deny the remainder of the averments in  
18 paragraph 5.

19          6.    The AZNARANS admit that Richard Aznaran was affili-  
20 ated with the Scientology organization for approximately 15 years.  
21 The AZNARANS admit that, during this time, Richard Aznaran held  
22 various staff positions with the Scientology organization. The  
23 AZNARANS deny the remainder of the averments in paragraph 6.

24          7.    The AZNARANS deny each and every averment of  
25 paragraph 7.

26          8.    The AZNARANS admit that on or about April 9, 1987,  
27 Vicki Aznaran attempted to escape from the physical control of CST  
28 and others. The AZNARANS admit that she escaped from the physical



1 control of the Scientology organization on or about April 9, 1987.  
2 The AZNARANS deny the remainder of the averments in paragraph 8.

3 9. The AZNARANS admit that on or about April 9, 1987,  
4 Vicki Aznaran and Richard Aznaran were restrained in a hotel room  
5 by agents for CST and others, and were not permitted to leave  
6 until they had signed numerous purported "sworn statements" for  
7 and "agreements" with CST and others. The AZNARANS admit that  
8 they desired to terminate their affiliation with the Scientology  
9 organization at this time and that they also sought to avoid being  
10 declared "fair game" by the Scientology organization. The  
11 AZNARANS deny the remainder of the averments in paragraph 9.

12 10. The AZNARANS admit that their horse was purchased  
13 from them by defendant Church of Scientology International for  
14 approximately \$1,500.00. The AZNARANS deny the remainder of the  
15 averments in paragraph 10.

16 11. The AZNARANS admit that at or around April 9, 1987  
17 they signed numerous purported "sworn statements" for and "agree-  
18 ments" with CST and others. The AZNARANS lack knowledge or  
19 information sufficient to form a belief as to the truth of the  
20 remainder of the averments in paragraph 11, and on that ground  
21 deny those averments.

22 12. The AZNARANS admit that in or about April 9, 1987,  
23 Vicki Aznaran signed numerous purported "sworn statements" for and  
24 "agreements" with CST and others. The AZNARANS admit that they  
25 signed these purported "sworn statements" and "agreements" in  
26 order to terminate their affiliation with CST and others without  
27 being declared "fair game". The AZNARANS also admit that Vicki  
28 Aznaran had been previously advised by Scientology counsel John

1 Peterson that documents identical or similar to these purported  
2 "sworn statements" and "agreements" were invalid and unenforce-  
3 able. The AZNARANS lack knowledge or information sufficient to  
4 form a belief as to the truth of the remainder of the averment  
5 and, on that ground, deny those averments.

6 13. The AZNARANS admit that in or about April 9, 1987,  
7 Richard Aznaran signed numerous purported "sworn statements" for  
8 and "agreements" with CST and others. The AZNARANS admit that  
9 they signed these purported "sworn statements" and "agreements" in  
10 order to terminate their affiliation with CST and others without  
11 being declared "fair game". The AZNARANS also admit that Vicki  
12 Aznaran had been previously advised by Scientology counsel John  
13 Peterson that documents identical or similar to these purported  
14 "sworn statements" and "agreements" were invalid and unenforce-  
15 able. The AZNARANS lack knowledge or information sufficient to  
16 form a belief as to the truth of the remainder of the averments  
17 and, on that ground, deny those averments.

18 14. The AZNARANS deny each and every averment of  
19 paragraph 14.

20 15. The AZNARANS deny each and every averment of  
21 paragraph 15.

22 16. The AZNARANS deny each and every averment of  
23 paragraph 16.

24 17. The AZNARANS admit that in or about April 1987, the  
25 AZNARANS departed California and went to Dallas, Texas. The  
26 AZNARANS admit that attorneys retained by CST and others provided  
27 Richard Aznaran with statements concerning investigative work  
28 performed by him under the supervision of said attorneys. The



1 AZNARANS admit that said statements were used by Richard Aznaran  
2 in his application to the State of Texas for a private investiga-  
3 tor license. The AZNARANS deny the remainder of the averments in  
4 paragraph 17.

5 18. The AZNARANS, refer to their response to the  
6 allegations of paragraph 1 through 17, inclusive, of the counter-  
7 claim and incorporate the same herein by said reference as though  
8 fully set forth at length.

9 19. The AZNARANS deny each and every averment of  
10 paragraph 19.

11 20. The AZNARANS admit that they filed the instant  
12 lawsuit against CST and other defendants. The AZNARANS deny the  
13 remainder of the averments in paragraph 20.

14 21. The AZNARANS deny each and every averment of  
15 paragraph 21.

16 22. The AZNARANS refer to their responses to the  
17 allegations of paragraphs 1 to 17 and 19 to 21, inclusive, and  
18 incorporates the same herein by said reference as though fully set  
19 forth at length.

20 23. The AZNARANS admit that they have met with certain  
21 individuals to discuss their experiences with CST and other  
22 Scientology entities with these individuals. The AZNARANS deny  
23 the remainder of the averments in paragraph 23.

24 24. The AZNARANS admit that they have discussed their  
25 experiences in the Scientology organization with Joseph A. Yanny,  
26 Jerold Fagelbaum, Welkos, Sappell, Bent Corydon, and agents of the  
27 Internal Revenue Service. Counterdefendants lack knowledge or  
28 information sufficient to form a belief as to the truth of the

1 remaining averments contained in paragraph 24 and on that basis  
2 deny each of those averments.

3 25. The AZNARANS deny each and every averment of  
4 paragraph 25.

5 26. The AZNARANS admit that they were interviewed by  
6 Los Angeles Times reporters Welkos and Sappell about their experi-  
7 ences with CST and the Scientology organization. The AZNARANS  
8 admit that the session was tape recorded by them and by the  
9 reporters. The AZNARANS also admit that the interview lasted over  
10 10 hours. The AZNARANS deny the remainder of the averments in  
11 paragraph 26.

12 27. The AZNARANS admit that in 1988, the Aznarans met  
13 with Corydon and discussed certain of their experiences with CST  
14 and the Scientology organization with him. The AZNARANS lack  
15 knowledge or information sufficient to form a belief as to the  
16 truth of the remaining averments contained in paragraph 27 and on  
17 that ground, denies each of these averments.

18 28. The AZNARANS admit that they met with attorney  
19 Jerold Fagelbaum, and discussed certain of their experiences with  
20 CST and the Scientology organization with him. The AZNARANS lack  
21 knowledge or information sufficient to form a belief as to the  
22 truth of the remainder of the averments and, on that ground,  
23 denies those averments.

24 29. The AZNARANS admit that they were subpoenaed by  
25 agents of the IRS, and were interviewed concerning certain of  
26 their experiences with CST and the Scientology organization. The  
27 AZNARANS deny the remainder of the averments in paragraph 29.















PROOF OF SERVICE BY MAIL

I, Catalina Jauregui, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1600 Wilshire Boulevard, Suite 300, Los Angeles, California 90017-1695.

On October 12, 1988, I deposited a document entitled ANSWER TO COUNTERCLAIM OF CHURCH OF SPIRITUAL TECHNOLOGY in a United States Mail bag. I am familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service, and the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business. The document was addressed to concerned parties in this action and a true copy thereof was enclosed in a sealed envelope with postage thereon fully prepaid, addressed as follows:

See attached service list.

The envelope was sealed and placed for collection and mailing on the date set forth above following ordinary business practices.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on October 12, 1988, at Los Angeles, California.

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Catalina Jauregui

AZNARAN v. SCIENTOLOGY

Service List

1  
2  
3  
4 Howard L. Weitzman, P.C.  
5 William T. Drescher  
6 Wyman, Bautzer, Kuchel & Silbert  
7 Two Century Plaza, 14th Floor  
8 2049 Century Park East  
9 Los Angeles, California 90067

10  
11 Earle C. Cooley  
12 Cooley, Manion, Moore & Jones, P.C.  
13 530 Atlantic Avenue  
14 Boston, Massachusetts 02210

15  
16 Kendrick L. Moxon  
17 Bowles & Moxon  
18 6255 Sunset Boulevard, Suite 2000  
19 Hollywood, California 90028

20  
21 Eric Lieberman  
22 Rabinowitz, Boudin, Standard,  
23 Krinsky & Lieberman, P.C.  
24 740 Broadway at Astor Place  
25 New York, New York 10003

26  
27 Michael L. Hertzberg  
28 275 Madison Avenue  
New York, New York 10016

Lawrence E. Heller  
Lenske, Lenske & Heller  
6400 Canoga Avenue, Suite 315  
Woodland Hills, California 91367